

#400
ER

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

CALVIN DAMON and ROSEANNE DAMON, h/w

Case No.

14

1954

Plaintiffs.

v.

AIRFON MANUFACTURING CORP.;
ALCATEL-LUCENT; ALLEN-BRADLEY
COMPANY; BASIC, INC. (c/o CT
CORPORATION SYSTEMS); BBC BROWN
BOVERI (k/n/a ABB, INC.); BELDEN
MANUFACTURING CO.; BUFFALO PUMPS,
INC.; CARRIER CORPORATION; CBS
CORPORATION, formerly Westinghouse Electric
Corporation (c/o PRENTICE HALL); CLARK
CONTROLLER Co. (c/o GTE PRODUCTS
CORPORATION); CLARK EQUIPMENT
COMPANY A Division of INGERSOLL RAND;
CLEAVER-BROOKS, INC. A Division of AQUA-
CHEM INC.; EATON CORPORATION (CT
CORPORATION); EMERSON; GENERAL
ELECTRIC COMPANY; GREEN, TWELD &
COMPANY; GTE PRODUCTS OF
CONNECTICUT CORPORATION; GOULD
ELECTRONICS INC. (CT CORPORATION
SYSTEMS); HONEYWELL INTERNATIONAL;
HONEYWELL, INC.; KEELER-DORR-OLIVER
INC.; LOCKHEED MARTIN; METROPOLITAN
LIFE INSURANCE CO.; MINNESOTA MINING
AND MANUFACTURING; MOTOROLA
SOLUTIONS; OCEAN VIEW CAPITAL, INC.
(f/k/a TRIANGLE WIRE & CABLE); PARKER
HANNIFIN; RAYTHEON; ROCKBESTOS CO.
(c/o U.S. CORPORATION CO.); RUMSEY
ELECTRIC CO.; SCHLUMBERGER NV;
SIEMEN'S INDUSTRY INC., as successor to
SIEMEN'S ENERGY & AUTOMATION, INC.;
SQUARE D COMPANY; TRANE US INC. (f/k/a
AMERICAN STANDARD INC.); USX
CORPORATION; WESTERN ELECTRIC (c/o
ALCATEL LUCENT);

Defendants.

**DEFENDANT LOCKHEED MARTIN CORPORATION'S NOTICE OF
REMOVAL OF ACTION UNDER 28 U.S.C. §1442(a) (FEDERAL OFFICER)**

TO THE HONORABLE COURT AND ALL PARTIES AND THEIR
ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Defendant Lockheed Martin Corporation ("Lockheed Martin") hereby gives notice of the removal of the above-entitled action from the Court of Common Pleas, Philadelphia County, to the United States District Court for the Eastern District of Pennsylvania pursuant to 28 U.S.C. § 1442(a). In support, Lockheed Martin offers the following:

I. Background

1. On or about February 27, 2014, Plaintiffs Calvin Damon and Roseanne Damon ("Plaintiffs") filed a personal injury action in the Court of Common Pleas of Philadelphia County, Civil Section: Trial Division, entitled *Calvin Damon and Roseanne Damon, h/w v. Aireon Manufacturing Corp., et al.*, Case No. 2955 (the "Complaint"). The Complaint names 36 defendants, including Lockheed Martin, and alleges causes of action for negligent and strict products liability, breach of warranty, and conspiracy. A true and correct copy of the Summons and Complaint, received by Lockheed Martin on March 7, 2014, as well as Plaintiffs' Master Long-Form Complaint (which Plaintiffs deem incorporated by reference in their Complaint) are attached hereto as **Exhibit 1**.

2. Plaintiffs allege, *inter alia*, that Plaintiff Calvin Damon ("Plaintiff") served in the U.S. Navy, "[f]rom 02/01/64 to 07/01/67," as a "radarman/3rd class" aboard the USS Lake Champlain and USS Independence and that "he was exposed to asbestos only in the Navy in the years 1964-1967." (Complaint, at ¶¶ 6(a), 7). Plaintiffs further allege that "[a]t all times material[,] Lockheed Martin and/or its predecessors sold radar[,] sonar and electrical equipment containing asbestos" and that "exposure to such products caused [Plaintiff's] injuries." (Complaint, at ¶ 10(q).)

3. At all times, including the period of Plaintiffs alleged service in the United States Navy, any radar, sonar, and electrical equipment supplied by Lockheed Martin to the

United States Navy was designed and manufactured specifically for the United States Military in accordance with detailed specifications approved by the United States Government and under the direct supervision, control, orders, and directives of a federal officer acting under color of federal office.

4. This Notice of Removal is being filed within 30 days of the time Lockheed Martin first received notice, via Plaintiffs' Complaint, of the grounds for removal of this action. Accordingly, this removal is filed within the time period prescribed by law. *See* 28 U.S.C. § 1446(b).

5. This action is one which may be removed to this Court by Lockheed Martin on the grounds of federal officer removal jurisdiction pursuant to 28 U.S.C. § 1442(a).

II. Federal Officer Removal Is Appropriate Under 28 U.S.C. § 1442(a)

6. Removal is proper under 28 U.S.C. § 1442(a) when: (a) the defendant seeking removal demonstrates that it is a "person" within the meaning of the statute; (b) the defendant demonstrates a causal nexus between the plaintiff's claims and the defendant's actions taken pursuant to a federal officer's directions and under color of federal office; and (c) the defendant asserts a "colorable federal defense" to such claims. *Mesa v. California*, 489 U.S. 121, 124-25, 134-35 (1989); *Hagen v. Benjamin Foster Co.*, 739 F.Supp.2d 770, 776 (E.D. Pa. 2010).

7. Lockheed Martin is a "person" within the meaning of 28 U.S.C. § 1442(a). *See Hagen*, 739 F.Supp.2d at 776 n.6; *see also Wimers v. Diamond Shamrock Chem. Co.*, 149 F.3d 387, 398 (5th Cir. 1998).

8. Plaintiffs base their claims against Lockheed Martin, in whole or in part, on Plaintiff's alleged exposure to asbestos while serving as a United States Navy radarman from 1964 to 1967. To the extent that the design or manufacture of radar, sonar, and electrical equipment manufactured by Lockheed Martin for the United States Military during the relevant time-period included asbestos-containing parts or components, the United States Government approved reasonably precise specifications for such inclusion

by and through the Secretaries of the Department of Defense and the Department of the Navy. Any decision regarding asbestos in the radar, sonar, and electrical equipment or the component parts thereof was under the full control and direction of the United States Government. *See Hagen*, 739 F.Supp.2d at 776, 784. The United States Government, likewise, controlled the content of written materials and warnings associated with such equipment.

9. Lockheed Martin is entitled to federal officer removal under 28 U.S.C. §1442(a) based upon the federal defense of derivative sovereign immunity as set forth in *Yearsley v. W.A. Ross Construction Co.*, 309 U.S. 18 (1940). *Yearsley* established that a government contractor, performing at the direction and authorization of a government officer, is immune from suit based upon performance of the contract in carrying out a government function. *See Yearsley*, 309 U.S. at 13; *see also Butters v. Vance Intern. Inc.*, 225 F.3d 462, 466 (4th Cir. 2000). Here, the *Yearsley* doctrine is satisfied because any Lockheed Martin-manufactured radar, sonar, or electrical equipment allegedly at-issue was manufactured pursuant to validly conferred authority, and Lockheed Martin's conduct was within the bounds of that authority. Indeed, if the Government had manufactured such equipment itself, it would be immune from suit. Such immunity must be extended to Lockheed Martin, which stepped into the Government's shoes.

10. Lockheed Martin also is entitled to federal officer removal under 28 U.S.C. § 1442(a) based upon the separate and independent government contractor federal defense. *Boyle v. United Technologies Corp.*, 487 U.S. 500 (1988). *Boyle* establishes that a government contractor is not liable for injuries caused by design defects in equipment when the contractor builds such equipment according to reasonably precise Government-approved design specifications. Here, the government contractor defense is satisfied because any and all design specifications for radar, sonar, and electrical equipment at-issue were Government-approved, the radar, sonar, and electrical equipment conformed to those specifications, and Lockheed Martin did not fail to warn the Government of any dangers

known to Lockheed Martin and unknown to the Government. The government contractor defense also applies to claims of failure to warn. *See Tate v. Boeing Helicopters*, 55 F. 3d 1150, 1157 (6th Cir. 1995); *see also Hagen*, 739 F.Supp. 2d at 783.

III. Procedural Compliance

11. Lockheed Martin satisfies the requirements for removal under 28 U.S.C. §1442(a) and, therefore, is entitled to remove this entire action. Joinder of other defendants in this action is not necessary to remove under 28 U.S.C. § 1442(a). *Huntingdon Valley Club Condo. Ass'n v. Pa. Hous. Finance Agency*, No. 04-4770, 2005 WL 44524, at *2 (E.D. Pa. Jan. 10, 2005) citing *Akin v. Ashland Chem. Co.*, 156 F.3d 1030, 1034 (10th Cir. 1998).

12. Lockheed Martin promptly will give notice of the filing of this Notice as required by 28 U.S.C. § 1446(d).


IV. Conclusion

13. Removal of this action is proper under 28 U.S.C. § 1442. Plaintiffs' Complaint is a civil action brought in State Court and the Federal District Courts have original jurisdiction over the subject matter under 28 U.S.C. § 1442(a)(1) because Lockheed Martin was acting as an officer or agent of the United States.

WHEREFORE, Lockheed Martin Corporation requests that this action proceed in this Court as a properly removed action.

DICKIE, MCCAMEY & CHILCOTE P.C.

By:


/s/ William R. Adams
William R. Adams (No. 4972)
222 Delaware Avenue
Suite 1040
Wilmington, DE 19801
Telephone No.: (302) 428-6133
Facsimile No.: (888) 811-7144

Date: April 2, 2014

ER

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

CALVIN DAMON and ROSEANNE DAMON, h/w

Case No.

14

1954

Plaintiffs.

v.

AIREON MANUFACTURING CORP.;
ALCATEL-LUCENT; ALLEN-BRADLEY
COMPANY; BASIC, INC. (c/o CT
CORPORATION SYSTEMS); BBC BROWN
BOVERI (k/n/a ABB, INC.); BELDEN
MANUFACTURING CO.; BUFFALO PUMPS,
INC.; CARRIER CORPORATION; CBS
CORPORATION, formerly Westinghouse Electric
Corporation (c/o PRENTICE HALL); CLARK
CONTROLLER CO. (c/o GTE PRODUCTS
CORPORATION); CLARK EQUIPMENT
COMPANY A Division of INGERSOLL RAND;
CLEAVER-BROOKS, INC. A Division of AQUA-
CHEM INC.; EATON CORPORATION (CT
CORPORATION); EMERSON; GENERAL
ELECTRIC COMPANY; GREEN, TWEED &
COMPANY; GTE PRODUCTS OF
CONNECTICUT CORPORATION; GOULD
ELECTRONICS INC. (CT CORPORATION
SYSTEMS); HONEYWELL INTERNATIONAL;
HONEYWELL, INC.; KEELER-DORR-OLIVER
INC.; LOCKHEED MARTIN; METROPOLITAN
LIFE INSURANCE CO.; MINNESOTA MINING
AND MANUFACTURING; MOTOROLA
SOLUTIONS; OCEAN VIEW CAPITAL, INC.
(f/k/a TRIANGLE WIRE & CABLE); PARKER
HANNIFIN; RAYTHEON; ROCKBESTOS CO.
(c/o U.S. CORPORATION CO.); RUMSEY
ELECTRIC CO.; SCHLUMBERGER NV;
SIEMEN'S INDUSTRY INC., as successor to
SIEMEN'S ENERGY & AUTOMATION, INC.;
SQUARE D COMPANY; TRANE US INC. (f/k/a
AMERICAN STANDARD INC.); USX
CORPORATION; WESTERN ELECTRIC (c/o
ALCATEL LUCENT);

Defendants.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Defendant, Lockheed Martin's Notice of Removal and Rule 7.1 Disclosure Statement will be served upon the following by Regular U.S. Mail, postage pre-paid, on April 2, 2014.

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DICKIE, McCAMEY & CHILCOTE, P.C.



04/02/14

BY: /s/ William R. Adams
William R. Adams, Esquire
Attorney for Defendant,
Lockheed Martin Corporation

EXHIBIT 1

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

For Prothonotary Use Only (Docket Number)

FEBRUARY 2014**002955**

E-Filed Number: 1402043995

PLAINTIFF'S NAME
CALVIN DAMON

DEFENDANT'S NAME
ATEXON MANUFACTURING CORP.

PLAINTIFF'S ADDRESS
26 DELAWARE DRIVE
MILFORD PA 18331

DEFENDANT'S ADDRESS
601 PATRICK TRAVEL WAY
KANSAS CITY KS

PLAINTIFF'S NAME
ROSSEANNE DAMON

DEFENDANT'S NAME
ALCOHOL-TECHENT

PLAINTIFF'S ADDRESS
26 DELAWARE DRIVE
MILFORD PA 18331

DEFENDANT'S ADDRESS
601-100 MURRAY HILL AVENUE
MURRAY HILL NC 27974

PLAINTIFF'S NAME

DEFENDANT'S NAME
ALLEN-BRADLEY COMPANY

PLAINTIFF'S ADDRESS

DEFENDANT'S ADDRESS
801 EXCELSIOR DRIVE SUITE 200
MILFORD VT 05317

NUMBER OF PLAINTIFFS

2

TOTAL NUMBER OF DEFENDANTS

36

COMMENCEMENT OF ACTION

☒ Complaint

☐ Petition Action

☐ Notice of Appeal

☐ Writ of Summons

☐ Transfer From Other Jurisdiction

AMOUNT IN CONTROVERSY

☐ \$50,000.00 or less

☒ More than \$50,000.00

COURT PROGRAMS

☐ Arbitration

☐ Jury

☐ Non-Jury

☐ Other

☒ Mass Tort

☐ Savings Action

☐ Petition

☐ Commerce

☐ Minor Court Appeal

☐ Statutory Appeals

☐ Settlement

☐ Minors

☐ W/D/Survival

CASE TYPE AND CODE

MASS TORT ASBESTOS

STATUTORY BASIS FOR CAUSE OF ACTION

RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)

**FILED
PROTHONOTARY**

FEB 27 2014

J. MURPHY

IS CASE SUBJECT TO
COORDINATION OF DEF?

YES

NO

TO THE PROTHONOTARY

Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: CALVIN DAMON, ROSSEANNE DAMON

Papers may be served at the address set forth below

NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY

ROBERT E. PAUL

ADDRESS

1603 WALNUT ST
SUITE 300
PHILADELPHIA PA 19103

PHONE NUMBER

(610) 735-9200

FAX NUMBER

(215) 735-9988

SUPREME COURT IDENTIFICATION

2052

E-MAIL ADDRESS

rmazie@prmpolaw.com

SIGNATURE OF FILING ATTORNEY OR PARTY

ROBERT PAUL

DATE SUBMITTED

Thursday, February 27, 2014, 01:56 pm

FINAL COPY (Approved by the Prothonotary Clerk)

COMPLETE LIST OF DEFENDANTS:

1. WESTERN ELECTRIC
C/O ALCATEL LUCENT 600-700 MONTAIGNE ROAD
MURRAY HILL NJ 07974
2. USX CORPORATION
400 BRANT STREET
PITTSBURGH PA 15219
3. TRANE US INC. F/K/A AMERICAN STANDARD INT.
1 CENTENNIAL AVENUE
PISCATAWAY NJ 08855
4. SQUARE D COMPANY
1415 S. FOSELLE ROAD
PALATINE IL 60067
5. SIEMENS INDUSTRY INC. AS SUCCESSOR TO SIEMENS ENERGY & AUT
333 OLD MILTON PARKWAY
ALEXANDRIA VA 22304
6. SCHLUMBERGER NV
5599 SAN FELIPE 17TH FLOOR
HOUSTON TX 77056
7. RUMSEY ELECTRIC CO.
15 COLWELL LANE
CONSHOHOCKEN PA 19428
8. ROCKWELL CO. C/O U.S. CORPORATION CO
2704 COMMERCE DRIVE SUITE B
HARRISBURG PA 17110
9. KAYTHEON
870 WINTER STREET
WALTHAM MA 02451
10. PARKER HANNIFIN
6035 PARLAND BLVD.
CLEVELAND OH 44124
11. OCEAN VIEW CAPITAL INC.
(F/K/A TRIANGLE WIRE & CABLE) 10 LINCOLN CENTER BLVD.
LINCOLN RI 02865
12. MOTOROLA SOLUTIONS
1301 EAST ALGONQUIN ROAD
SCHAUMBURG IL 60196
13. MINNESOTA MINING AND MANUFACTURING
3 M CENTER
ST. PAUL MN 55144
14. METROPOLITAN LIFE INSURANCE CO.
27-01 QUEENS PLAZA NORTH
LONG ISLAND CITY NY 11101
15. LOCKLEED MARTIN
8801 ROCKLEDGE DRIVE
BETHESDA MD 20817
16. KEELER-DORR-OLIVER INC., C/O MARK F. DIAMETTI, ESQ
THREE LOGAN SQUARE 1717 ARCH STREET, SUITE 3410
PHILADELPHIA PA 19102
17. HONEYWELL INC.
101 COLUMBIA ROAD
MORRISTOWN NJ 07962
18. HONEYWELL INTERNATIONAL
101 COLUMBIA ROAD
MORRISTOWN NJ 07960
19. GOULD ELECTRONICS INC.
2390 E. CAMELBACK ROAD SUITE 110
PHOENIX AZ 85016
20. GTE PRODUCTS OF CONNECTICUT CORPORATION
100 ENGICOTT STREET
DANVERS MA 01923
21. GREENE, TWEED & COMPANY
DETWEILER ROAD
KUBA/TIMBER PA 19443
22. GENERAL ELECTRIC COMPANY
ONE RIVER ROAD
SCHENECTADY NY 12345
23. EMERSON
8000 W. FLORISSANT AVENUE

- ST. LOUIS MO 63136
24. EATON CORPORATION
1300 EAST 9TH STREET
CLEVELAND OH 44114
 25. CLEAVER-BROOKS, INC. A DIVISION OF AQUA-CHEM, INC.
3707 NORTH RICHARDS P.O. BOX 121
MILWAUKEE WI 53201
 26. CLARK EQUIPMENT COMPANY
A DIVISION OF INGERSOLL RAND P.O. BOX 8410
PISCATAWAY NJ 08855
 27. CLARK CONTROLLER CO. C/O GFF PRODUITS CORPORATION
100 ENDICOTT STREET
DANVERS MA 01923
 28. CBS CORPORATION, FORMERLY WESTINGHOUSE ELECTRIC CORPORATION
80 STATE STREET
ALBANY NY 12207
 29. CARRIER CORPORATION
1 CARRIER PLACE
FARMINGTON CT 06034
 30. BUFFALO PUMPS, INC.
874 OLIVER STREET
NORTH TONAWANDA NY 14120
 31. BELDEN MANUFACTURING CO.
7733 FORSYTH BLVD., #800
ST. LOUIS MO 63105
 32. BEC DROWN BOVERI (K/N/A AB2, INC.)
CONSTITUTION PLACE, SUITE 1320 525 CHESTNUT STREET
PHILADELPHIA PA 19106
 33. BASIC, INC.
C/O CT CORPORATION SYSTEMS 116 PINE STREET, SUITE 320
HARRISBURG PA 17101
 34. ALLEN-BRADLEY COMPANY
8040 EXCELSIOR DRIVE SUITE 200
MADISON WI 53717
 35. ALCATEL-LUCENT
600-100 MURRAY HILL AVENUE
MURRAY HILL NJ 07974
 36. AIRECN MANUFACTURING CORP.
1401 FAIR FAX TRAFFIC WAY
KANSAS CITY KS

PAUL REICH & MYERS, P.C.
Firm No. 99997
By: Robert E. Pau, Esquire
Identification No. 21252
Attorney for Plaintiff
1608 Walnut Street, Suite 500
Philadelphia, PA 19103
(215) 733-9200

**THIS IS NOT AN ARBITRATION
MATTER.**
**ASSESSMENT OF DAMAGES
HEARING NOT REQUIRED
JURY TRIAL DEMAND.**

**IN THE COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY
TRIAL DIVISION: CIVIL SECTION**

CALVIN DAMON and
ROSEANNE DAMON, I/w
125 Delaware Drive
Milford, PA 18337

FEBRUARY TERM, 2014

vs.

NO

AIREON MANUFACTURING CORP.
1401 Fair Fax Traffic Way
KANSAS CITY, KS
(continued.)

ASBESTOS CASE

**COMPLAINT - CIVIL ACTION
2090 ASBESTOS**

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
ONE READING CENTER
PHILADELPHIA, PENNSYLVANIA 19107
TELEPHONE: (215) 238-1701

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hacer falta asistir una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomar medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVER GUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACIÓN DE LICENCIADOS DE FILADELPHIA
SERVICIO DE REFERENCIA E INFORMACIÓN
ONE READING CENTER
FILADELPHIA, PENNSYLVANIA 19107
TELÉFONO: (215) 238-1701

ALCATEL-LUCENT
500-700 Murray Hill Avenue
MURRAY HILL, NJ 07974

ALLEN-BRADLEY COMPANY ()
304C Excelsior Drive, Suite 200
MADISON, WI USA 53717

BASIC, INC. (215)
c/o CT Corporation Systems
116 Pine Street, Suite 320
HARRISBURG, PA 17101

BBC BROWN BOVERI (465)
"k/n/a ABB, Inc."
c/o WILLIAM J. O'BRIEN
DELANEY & O'BRIEN
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PHILADELPHIA, PA 19106

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7733 Forsyth Blvd., #800
ST. LOUIS, MO 63105

BUFFALO PUMPS, INC. ()
874 Oliver Street
North Tonawanda, NY 14120

CARRIER CORPORATION ()
1 Carrier Place
FARMINGTON, CT 06034

CBS Corporation, formerly Westinghouse Electric Corporation ()
c/o Prentice Hall
80 State Street
ALBANY, NY 12207

CLARK CONTROLLER CO. (396)
c/o GTE Products Corporation
100 Endicott Street
DANVERS, MA 01923

CLARK EQUIPMENT COMPANY (2686)
A Division of Ingersoll Rand
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PISCATAWAY, NJ 08855

CLEAVER-BROOKS, INC. (155)
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EATON CORPORATION (434)
CT Corporation
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CLEVELAND, OH 44114

EMERSON ()
6000 W. FLOISSANT AVENUE
ST. LOUIS, MO 63136

GENERAL ELECTRIC COMPANY (064)
One River Road
SCHEMECTADY, NY 12345

GREENE, TWEEED & COMPANY (132)
Detweiler Road
KULPSVILLE, PA 19443

GTE PRODUCTS OF CONNECTICUT CORPORATION ()
100 Endicott Street
Danvers, MA 01923

Gould Electronics Inc. ()
CT Corporation Systems
2390 E. Camelback Road
Suite 110
PHOENIX, AZ 85016

HONEYWELL INTERNATIONAL (048)
101 Columbia Road
MORRISTOWN, NJ 07960

HONEYWELL, INC. ()
101 Columbia Road
Morristown, NJ 07962

KEELER-DORP-CLEVER INC. (225)
c/o Walter S. Jenkins, Esq.
Maron & Marvel P.A.
Three Logan Square
1717 Arch Street, Suite 3710
PHILADELPHIA, PA 19103

LOCKHEED MARTIN
6801 Rockledge Drive
BETHESDA, MD 20817

METROPOLITAN LIFE INSURANCE CO. ()
27-01 Queens Plaza North
LONG ISLAND CITY, NY 11101

MINNESOTA MINING AND MANUFACTURING ()
3 M Center
ST. PAUL, MN 55144

MOTOROLA SOLUTIONS
1301 East Algonquin Road
SCHAUMBURG, IL 60196

OCEAN VIEW CAPITAL, INC. ()
f/k/a Triangle Wire & Cable
10 Lincoln Center Boulevard
Lincoln, RI 02865

PARKER HANNIFIN ()
6035 Parkland Blvd.
CLEVELAND, OH 44124

RAYTHEON
370 Winter Street
WALTHAM, MA 02151

ROCKBESTOS CO. (425)
c/o U.S. Corporation Co.
2704 Commerce Drive, Suite B
HARRISBURG, PA 17110

RUMSEY ELECTRIC CO. (477)
15 Colwell Lane
CONSHOHOCKEN, PA 19428-0227

SCHLUMBERGER NV
5599 San Felipe
17th Floor
HOUSTON, TX 77056

SIEMENS INDUSTRY INC., as successor to Siemens Energy &
Automation, Inc. ()
333 Old Milton Parkway
ALPHARETTA, GA 30005

SQUARE D COMPANY (4399)
1415 S. Roselle Road
PALATINE, IL 60067

TRANE US INC. ()
f/k/a American Standard Inc.
1 Centennial Avenue
PISCATAWAY, NJ 08855

USX CORPORATION (4653)
600 Grant Street
PITTSBURGH, PA 15219

WESTERN ELECTRIC ()
c/o Alcatel Lucent
600-700 Mountain Road
MURRAY HILL, NJ 07974

PAUL, REICH & MYERS, P.C.
Firm No. 99997
By: Robert E. Paul, Esquire
Identification No. 21252
Attorney for Plaintiff
608 Walnut Street, Suite 300
Philadelphia, PA 19103
(215) 775-9200

**THIS IS NOT AN ARBITRATION
MATTER.
ASSESSMENT OF DAMAGES
HEARING NOT REQUIRED.
JURY TRIAL DEMANDED.**

**IN THE COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY
TRIAL DIVISION: CIVIL SECTION**

CALVIN DAMON and
ROSEANNE DAMON, w/w
126 Delaware Drive
Milford, PA 18337

FEBRUARY TERM, 2014

vs

NO

AIRFON MANUFACTURING CORP., et al
1401 Fair Fax Traffic Way
KANSAS CITY, KS

**COMPLAINT -- CIVIL ACTION
ASBESTOS**

1. Plaintiffs, CALVIN DAMON and Roseanne DAMON, husband and wife, reside at 126 Delaware Drive, MILFORD, Pennsylvania, and are citizens of the Commonwealth of Pennsylvania.

2. Plaintiff, CALVIN DAMON was born on July 29, 1946, and his Social Security Number is 149-36-7744.

3. Plaintiff, CALVIN DAMON's only dependent is his wife Roseanne Damon.

4. Plaintiff, CALVIN DAMON, has smoked approximately 1 pack(s) of cigarettes per day from 1963 until 2003.

Case ID: 140202955

5 Plaintiff's Social Security and IRS records will be furnished upon receipt.

6. Plaintiff's work history is as follows:

(a) From 02/01/64 to 07/01/67 - U.S. Navy (USS Lake Champlain/USS Independence) as a radarman/3rd class e-4.

(b) From 01/01/67 to 03/31/67 - Metropolitan Life (Hoboken, NJ) as a salesman.

(c) From 06/01/67 to 07/31/68 - Two Guys Department Store (Hackensack, NJ) as a pet dept. worker.

(d) From 08/01/68 to 07/31/70 - Edwin's Sport Shop (Patterson, NJ) as a salesman.

(e) From 08/01/70 to 07/31/72 - Doctor's Pet Centers (Wayne, NJ) as a pet dept. salesman.

(f) From 08/01/72 to 12/31/73 - Sea Shell Pet Shop as an owner.

(g) From 01/01/74 to 12/31/74 - The Money Paper (Toms River, NJ) as a sales & marketing person.

(h) From 01/01/74 to 12/31/74 - Mark Scott Pubb (Dover, NJ) as a sales & marketing person.

(i) From 01/01/76 to 05/31/79 - Shawnee on Delaware as a time share salesman.

(j) From 06/01/79 to 05/31/80 - RONC Market Group County Square as a salesman.

(k) From 06/01/80 to 05/31/83 - Fernwood Resort (Duskill, PA) as a salesman.

(l) From 06/01/83 to 05/31/85 - Wayne Newton Resort as a time share salesman.

(m) From 06/01/85 to 10/31/86 - Atlantic Solar Fishkill, NJ) as a sales manager.

(b) From 11/01/85 to 12/31/87 - NACO as a campground time share salesman.

(c) From 01/01/88 to 12/31/88 - The Breakers Condos in Atlantic City, NJ as a sales consultant.

(d) From 01/01/88 to 12/31/88 - Preferred Builders (Pocinos) as a sales consultant.

(e) From 01/01/89 to 12/31/89 - DNK Company as a home designer salesman.

(f) From 01/01/99 to 05/31/05 - Homes of Distinction as a salesman.

(g) From 06/01/05 to 12/31/08 - A to Z Custom Homes as a salesman.

7. Plaintiff believes and therefore avers that he was exposed to asbestos only in the Navy in the years 1964-1967.

8. Plaintiff incorporates by reference against defendants all the allegations of the Complaints filed in Joan Neely, Executrix of Harry Platt v. Abex Corporation, et al., Philadelphia C.P. May Term, 1985, No. 2678, Rafael and Cecilia Montero v. Abex Corporation, et al., Philadelphia C.P. July Term, 1986, No. 1216, and Richard and Suzanne Balbirer v. Abex Corporation, et al., Philadelphia C.P. July Term, 1986, No. 649, and in Anna Tedeschi, Administratrix of Cosmo Tedeschi v. Abex Corporation, et al., Philadelphia C.P. January Term, 1986, No. 1641, and in the Master Plaintiffs' Complaint filed and prepared pursuant to the Order establishing the Master Pleadings Procedure in the Court of Common Pleas as if fully set out herein.

9. All allegations against defendants named in this lawsuit which were made in the Complaints filed in the lawsuits annotated in Paragraph 8 above or in the Master

Complaint are incorporated by reference.

11. While Plaintiff believes that the master complaint sufficiently pleads fact that demonstrate his exposure was pursuant to the maritime jurisdiction of the Court, he specifically avers that his exposure was on board ships and therefore is under the maritime jurisdiction of the Court.

(a) At all times material Aireon Manufacturing Corp. and/or its predecessors sold radar sonar and electrical equipment containing asbestos. Exposure to such products caused the injuries herein.

(b) At all times material, Lucent is the successor in interest to Western Electric and Bell Labs and At&T Technologies. At all times material one or more of these entities supplied, the following asbestos products flat type resistor, wire with felted asbestos coverings, washers, cable bags, cable vault covers, cement conduit, asbestos fillers, asbestos gloves, ebony power boards, asbestos paper and millboard, phenolic molding compounds, asbestos sheet, asbestos covered cables, asbestos braided sleeving, asbestos tape and packing sheet, graphite asbestos, soldering wiping pads, power cords, cable, board and radar and sonar equipment containing asbestos for the Navy. Exposure to such asbestos products caused the injuries herein.

(c) Defendant, Allen-Bradley Company, is a Wisconsin corporation with its principal place of business at 1201 S. Second Street, Milwaukee, Wisconsin 53204. Allen-Bradley is the successor in interest to the Rostone Corporation or sole shareholder of its creature and alter ego Rostone Corporation. It is responsible for all injuries caused by Rostone or by the Rostone Division of Allen-Bradley or its predecessors or by Allen-Bradley. The various

Rosstone entities and Allen-Bradley sold Rosite and other asbestos containing products to Westinghouse Electric and other entities including the Navy for power and other electrical uses. Exposure to these asbestos products caused the injuries complained of herein.

(d) Defendant, BBC Brown Boveri, is a Delaware corporation with its principal place of business in Delaware. It or its predecessors sold asbestos containing arc chutes, molded products and other asbestos products which caused the injuries complained of herein.

(e) Belden Manufacturing Company is a Missouri corporation with its principal place of business located in Missouri. At all times material it sold asbestos wire and cable and braid which caused the injuries complained of herein.

(f) At all times Buffalo sold pumps and/or valves insulated with asbestos or designed to be insulated with asbestos. As a result of exposure to asbestos on Buffalo pumps the injured party suffered the injuries complained of herein.

(g) At all times material Carrier or its predecessors sold asbestos containing equipment. Exposure to asbestos on Carrier's equipment caused the injuries complained of herein.

(h) The defendant, Clark Equipment Co., is an Indiana corporation which, at all times material, sold equipment containing asbestos products such as brake linings and gaskets or designed to include asbestos products supplied by others.

(i) Defendant, Cleaver-Brooks, Inc., is a Delaware corporation with a principal place of business located in Lebanon, Pennsylvania. At all times material hereto Cleaver-Brooks, Inc. sold boilers which were designed or intended to be insulated with asbestos. Because the boilers failed to contain adequate and

sufficient warnings of the possible hazards of asbestos, they were defective and the conduct of defendant in selling that those products without such warnings was negligent. Since asbestos insulation on the boilers had to be removed, it was dangerous and warnings should have been given. Cleaver supplied the asbestos for the boilers.

(j) Defendant, Eaton Corporation, is an Ohio corporation with its principal place of business located at 1111 Superior Avenue, S.E., Cleveland, Ohio. Eaton Corporation is the successor in interest to Cutler-Hammer Inc which sold asbestos containing brakes and electrical products that caused the injuries herein such as for power, radar and sonar use on ships.

(k) At all times material defendant Emerson or its predecessors in interest designed and/or intended its equipment to include asbestos or knew its products were likely to be insulated with asbestos. Exposure to the asbestos from the defendant's product caused the injuries complained of herein.

(l) Defendant, Greene, Tweed & Company, is a Pennsylvania corporation with its principal place of business located at Detweiler Road, Kulpville, Pennsylvania.

(m) Defendant, GTE Products Corporation, is the successor in interest to the company which manufactured Clark asbestos-containing brake shoes and Clark Controller electrical products. Exposure to such asbestos caused the injuries herein.

(n) Defendant Gould is a Delaware Corporation with its principal place of business in Arizona. At all times material defendant Gould Electronics or its predecessors manufactured, assembled sold or delivered asbestos containing electrical products or designed or intended its electrical products to contain or be

covered by asbestos such as but not limited to Bulldog brand products containing or covered by asbestos. Exposure to asbestos from these products caused the injuries complained of herein.

(o) Defendant, HONEYWELL at all times material sold and/or installed, and thermocouples and valves containing asbestos. As a result of the asbestos being released during installation, operation or repair of the products at issue herein, the asbestos was inhaled by the injured person causing the injuries complained of herein.

(p) Defendant, Keeler/Dorr - Oliver Boiler Co., is a Pennsylvania Corporation with its principal place of business at 238 West Street, Williamsport, Pennsylvania. At all times material to this action, Keeler/Dorr-Oliver or its predecessor in interest, Keeler, sold boilers designed to include asbestos or which it knew or should have known would be insulated with asbestos and on which asbestos would be installed and from which asbestos would be removed. As a result of working on, in or around Keeler boilers, employee herein was exposed to asbestos which caused his injuries.

(q) At all times material Lockheed Martin and/or its predecessors sold radar sonar and electrical equipment containing asbestos. Exposure to such products caused the injuries herein.

(r) At all times material Metropolitan Life Insurance Company conspired with others to prevent dissemination of knowledge of the possible hazards of asbestos.

(s) At all times material defendant Minnesota Mining and Manufacturing sold asbestos products which caused the injuries complained of herein including arc proofing tape and also sold defective respirators which did not prevent the injuries herein. It

is also sued as a supplier of asbestos-containing body filler and other products for automobiles and ships.

(t) At all times material defendant Motorola Solutions or its predecessor(s) such as Galvin Manufacturing sold asbestos-containing radar sonar and electrical products. Exposure to such asbestos products caused the injuries herein.

(u) Defendant Ocean View Capital, Inc., successor to Triangle Wire and Cable Company, is a Rhode Island corporation with its principal place of business located at 900 Third Avenue, New York, New York. At all times material to this action it sold asbestos-containing products to which plaintiff or decedent was exposed. This exposure was a substantial contributing factor to the injuries complained of herein.

(v) At all times material to this action, defendant Parker Hannifin, manufactured and sold asbestos-containing gaskets, exposure to which caused the injuries at issue herein.

(w) At all times material Raytheon and its predecessors sold asbestos-containing radar, sonar and electrical products. Exposure to such asbestos caused the injuries herein.

(x) Defendant, Rumsey Electric Company, is a Pennsylvania corporation with its principal place of business located at 15 Colwell Lane, Conshohocken, Pennsylvania.

(y) At all times material Schlumberger's predecessor Sangamo Electric made and/or distributed asbestos containing products for sonar and radar and other electrical products. Exposure to such asbestos caused the injuries herein.

(z) Defendant, Siemen is a Delaware Corporation with its principal place of business in Georgia. At all times material defendant Siemen's or its predecessors manufactured, assembled sold

or delivered asbestos containing electrical products or designed or intended its electrical products to contain or be covered by asbestos such as but not limited to Bulldog brand production containing or covered by asbestos. Exposure to asbestos from these products caused the injuries complained of herein.

(aa)Defendant, Square D Company, is a Delaware corporation with its principal place of business located at Executive Plaza, Palatine, Illinois. It negligently sold defective asbestos-containing wire, cable, arc chutes and other asbestos-containing electrical products and control products including, but not limited to, breakers to which plaintiff/decendent was exposed.

(ab)Defendant, Trane is the successor in interest to American Standard Co. Trane and American Standard sold asbestos-containing products such as, but not limited to, radios for ships to which plaintiff was exposed.

(ac)Defendant, USX Corporation, is a Delaware corporation with its principal place of business in Pennsylvania. It is the successor in interest to US Steel. US Steel manufactured and/or distributed asbestos-containing wire and cable to which Plaintiff was exposed and which caused his injury.

(ad)At all times material to this action Western Electric sold asbestos containing power and electrical equipment for use on ships.

(ae) In addition to the claims pleaded against General electric in the Master complaint, GE is liable as the parent and successor to RCA. Both GE and RCA sold asbestos containing radio sonar and radar and other equipment which caused the injuries herein. RCA, at GE's direction, created Radio Marine Corporation

which also provided such asbestos containing products which caused the injuries herein.

(af) In particular General Electric sold transmitter receivers serial numbers 3160158, 3160, 168, 3371200, 2120931 2120924, 2120927 for the USS Independence containing asbestos. Exposure to such asbestos caused the injuries herein.

(ag) Honeywell International successor to Bendix is sued not for brake linings but for asbestos in electrical radio sonar and radar equipment which caused the injuries herein.

11. During the course of his employment at the worksites noted in Paragraph 6(a) supra only, plaintiff believes and therefore avers that he was exposed to asbestos fiber or asbestos products manufactured, sold, distributed, or otherwise placed into the stream of commerce by the defendants. The term asbestos products as used herein includes asbestos-containing products such as boilers and engines and furnaces and turbines and electrical products. The term asbestos-containing as used herein means products sold with asbestos or products whose designers, manufacturers and fabricators knew, should or could have known that it would be insulated or could be insulated with asbestos.

12. Plaintiff does not now know whether or not he was exposed to asbestos products at worksites other than those enumerated in Paragraph 6 above, but he reserves his right to assert at trial that he was so exposed at the other sites, should such evidence develop. Plaintiff avers that should such evidence develop, he will promptly notify defendants well in advance of trial.

13. Plaintiff was diagnosed with lung cancer in December 2012 as a result of his asbestos exposure and was treated for the

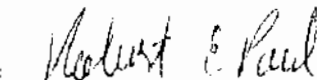
lung cancer at Norristown Hospital and such diagnosis was accompanied by discernible or ascertainable physical symptoms and/or functional impairment and/or other detrimental effects as a result of the exposure to asbestos. Plaintiff has developed symptoms due to his asbestos inhalations and injuries.

14. Plaintiffs plead for all of the items of damages set forth in the Complaints filed in the cases of Rafael Montero and Richard Balbirer and in the Master Complaint for all asbestos cases in the Court of Common Pleas which Complaints are referenced in Paragraph 9 of this Complaint.

WHEREFORE, plaintiffs demand of defendants a sum in excess of Fifty Thousand Dollars (\$50,000.00), exclusive of interest and costs for compensatory damages, and a sum in excess of Fifty Thousand Dollars (\$50,000.00) in punitive damages.

PAUL, REICH & MYERS P.C.

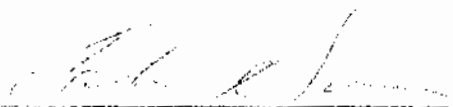
BY:



ROBERT E. PAUL

DECLARATION

I, , declare that I am a Plaintiff in the instant matter and the facts contained herein are true and correct to the best of my knowledge, information and belief. This statement is made subject to the penalties of 18 Pa. C.S. § 49(a) relating to unsworn falsification or assertions.



Long Form CUC PLAT

IN THE COURT OF COMMON PLEAS
FOR PHILADELPHIA COUNTY

IN RE: ASBESTOS LITIGATION : OCTOBER TERM, 1986
IN PHILADELPHIA COURT OF : NO. 8610-000
COMMON PLEAS :

PLAINTIFFS' MASTER LONG-FORM COMPLAINT IN
GAF, JOHNS-MANVILLE AND OWNS-CORNING FIBERGLAS
PLANT WORKER CASES

Pursuant to an Order dated July 30, 1986, by the
Honorable Edward J. Blake and the Honorable Richard B.
Klein, the undersigned attorneys for plaintiffs in asbestos
actions bring this Master General Long-Form Complaint
against the following defendants:

A. C. & S., INC.
180 W. Church Road
King of Prussia, Pennsylvania 19406 PROTHONOTARY
CODED

ABEX CORPORATION
c/o Prentice Hall Corporation
System, Inc.
100 Pine Street
Harrisburg, Pennsylvania 17108 OCT 08 1986
DATA PROC. C. RICE

AETNA CASUALTY & SURETY CO.
115 Farmington Avenue
Hartford, Connecticut 06115

AIRCO WELDERS SUPPLY
4501 N. Howard Street
Philadelphia, Pennsylvania 19140

ALLIED CORPORATION
Columbian Road & Park
Morristown, New Jersey 07961

ALPAX (USA) INC.
Marmonneck, New York

AMCHEM PRODUCTS, INC.
300 Brookside Avenue
Ambler, Pennsylvania 19002

AMERICAN ENERGY PRODUCTS, INC.
667 Brea Canyon Road
Suite 20-B
Walnut, California 91789

AMERICAN MOTORS SALES CORPORATION
c/o CT Systems
123 South Broad Street
Philadelphia, Pennsylvania 19107

FILE
PROTHON

86 OCT -7 P 145

AMERICAN STANDARD
Station Street
Wilmerding, Pennsylvania

AM GENERAL CORPORATION
701 Chippewa Avenue
South Bend, Indiana

AMOSA (PTY) LTD.
The Corner House
63 Fox Street
Johannesburg 2001 TVL
Republic of South Africa

ANCHOR PACKING COMPANY, INC.
One Buttonwood Square
2001 Hamilton Street
Philadelphia, Pennsylvania 19130

A.P. GREEN REFRACTORIES COMPANY
Hadley and Delaware Avenue
Philadelphia, Pennsylvania 19137

ARMSTRONG WORLD INDUSTRIES, INC.
Liberty and Charlotte Streets
Lancaster, Pennsylvania 17604

ASBEKA INDUSTRIES OF N.Y., INC.
2324 McDonald Avenue
Brooklyn, New York

ASEBESTOS CORPORATION LTD.
1940 Sun Life Building
1155 Metcalf Street
Montreal, Canada H3B2K6
or
Thetford Mines
Quebec, Canada

ASEBESTOS INSULATION COMPANY, INC.
a/k/a Deerland Corporation
311 West Marshall Street

Norristown, Pennsylvania 19401
ASEBESTOS PRODUCTS MFG. CORPORATION
c/o Herbert L. Levine
3215 Avenue "H"
Brooklyn, New York 11210

ASEBESTOSPRAY CORPORATION
c/o Herbert L. Levine
3215 Avenue "H"
Brooklyn, New York 11210

ASHLAND OIL, INC.
Box 391
Ashland, Kentucky 41114

ASSOCIATED INSULATION, INC.
Pennsylvania

ASSOCIATED MINERALS CORPORATION
Iver Lane Cowley, Uxbridge
Middlesex, England

ASTEN-HILL MANUFACTURING COMPANY
Henry and Roberts Avenues
Philadelphia, Pennsylvania

ATLAS TURNER, INC.
5600 Hochelaga Street
Montreal, Quebec, Canada

AUTOMOTIVE PARTS COMPANY
5505 Centre Avenue
Pittsburgh, Pennsylvania

A.W. CHESTERTON, INC.
Massachusetts

BABCOCK and WILCOX
1810 Chapel Ave. West
Cherry Hill, New Jersey
or
c/o Charles J. Tague, Jr.
P.O. Box 1310
Bryn Mawr, Pennsylvania 19010
or
1010 Common Street
New Orleans, Louisiana 70106

BABCOCK and WILCOX TUBULAR PRODUCTS
Box 401
Beaver Falls, Pennsylvania 15010

BALTIMORE & OHIO RAILROAD
c/o Rudolph Garcia, Esquire
Centre Square West, 38th Floor
Philadelphia, Pennsylvania 19102

BARKER PIPE FITTINGS CO.
271 Lancaster Pike
Frazer, Pennsylvania 19355

BASIC, INCORPORATED
845 Hama Building
Cleveland, Ohio 44115

BELL ASBESTOS MINES, LTD.
c/o Thetford Mines
P.O. Box 99
Quebec, Canada

BENJAMIN FOSTER
Division of Amchem
25 Brookside Avenue
Ambler, Pennsylvania 19002

BEVCO INDUSTRIES
790 Birney Highway
Aston, Pennsylvania 19014

BIRD, INCORPORATED
Washington Street
East Walpole, Massachusetts 02032

BORG WARNER CORPORATION
615 Griswold
Detroit, Michigan 48226

BRAKE & CLUTCH COMPANY
OF PHILADELPHIA
1610 Fairmount Avenue
Philadelphia, Pennsylvania 19130

BRAND INSULATIONS, INC.
c/o Norman L. Haase
Kelly, Haase & Dunn
344 West Front Street
Media, Pennsylvania 19063

BRINCO MINING LTD.
2000 Guinness Tower
1055 W. Hastings Street
Vancouver, B.C.
Canada V6E 3VE

BRITISH SOUTH AFRICA CO., LTD.
40 Holborn Viaduct
London, England

CAPE ASBESTOS FIBRES, LTD.
114 Park Street
London, W1Y 4AB
England

CAPE ASBESTOS INDUSTRIES, LTD.
114 Park Street
London, England

CAPE ASBESTOS S.A. (PTY) UNITED LTD.
The Corner House
63 Fox Street
Johannesburg 2001 TVL
Republic of South Africa

CAPE BOARD & PANELS
Iver Lane, Uxbridge
UB8, 2IQ, England

CAPE INDUSTRIES, LTD.
114 Park Street
London, W1Y 4AB
England

CAREY-CANADA, INC.
P.O. Box 190
E. Broughton Station
Quebec, Quebec,
Canada GON1H0

CARLISLE CORPORATION
* Molded Materials Co.
d/b/a/ Motion Control Industries
P.O. Box P
Gillis Avenue
Ridgeway, Pennsylvania

CE MINERALS, INC.
443 South Gulph Road
King of Prussia, Pennsylvania 19406

CE REFRACTORIES
a Division of Combustion Engineering, Inc.
901 East 8th Avenue
King of Prussia, Pennsylvania
or
900 Long Ridge Road
Stampan, Connecticut 06902

CELOTEX CORPORATION
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109
or
1500 W. Dalemabry Highway
Tampa, Florida 33607

CENTRAL JERSEY INDUSTRIES, INC.
2 Aldwyn Center
Villanova, Pennsylvania 19085

CENTRAL MINING FINANCE, LTD.
40 Holborn Viaduct
London, England

CERTAIN-TEED CORPORATION
Swedesford and Old School Roads
Valley Forge, Pennsylvania 19481

CHARLES F. GUYON
c/o Theodore Levy
900 South 4th Street
Harrison, New Jersey 07029

CHARTER CONSOLIDATED INVESTMENTS, LTD.
40 Holborn Viaduct
London, England

CHARTER CONSOLIDATED F.L.C.
40 Holborn Viaduct
London, England

CHARTER CONSOLIDATED SERVICES, LTD.
40 Holborn Viaduct
London, England

CHICAGO FIRE BRICK CO.
c/o Ralph Schindler
1467 N. Elston Avenue
Chicago, Illinois 60622

CHILDERS PRODUCTS COMPANY, INC.
23350 Marchantville Road
Cleveland, Ohio 44122

CHRYSLER CORPORATION
c/o G. Lee Philp
1200 Lynn Townsend Drive
Highland Park, Michigan 48203

CLARK CONTROLLER COMPANY
CT Company
123 South Broad Street
Philadelphia, Pennsylvania 19107

COLLINS PACKING COMPANY, INC.
5024 Mulberry Street
Philadelphia, Pennsylvania 19124

COLONIAL ELECTRIC SUPPLY
A Pennsylvania Corporation
2901 PSFS Building
Philadelphia, Pennsylvania

COLONIAL RUBBER
Elbo Lane and Texas Avenue
Mount Laurel, New Jersey 08054

COLUMBIA BOILER COMPANY OF POTTSTOWN
Old Reading Pike,
P. O. Box G
Pottstown, Pennsylvania 19464

COMBUSTION ENGINEERING CO., INC.
c/o Weaver, Willman & Arnold
705 McKnight Park Drive
Pittsburgh, Pennsylvania 15237
or
900 Long Ridge Road
Stamford, Connecticut 06902

CONSOLIDATED MINES SELECTION CO., LTD.
40 Holborn Viaduct
London, England

CONSOLIDATED RAIL CORPORATION
Six Penn Center Plaza
Philadelphia, Pennsylvania 19104

COONEY BROTHERS, INC.
S.W. Corner 5th and Dauphin
Philadelphia, Pennsylvania 19133

CRANE PACKING
682 Parkway
Brookmill, Pennsylvania

CROWN CORK & SEAL COMPANY, INC.
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

C. TENNANT & SONS & CO., OF NEW YORK
Division of Cargill
P. O. Box 9300
Minneapolis, Minnesota 55440

CULP BROTHERS, INC.
R.R.2
Box 369
Parkside, Pennsylvania 18944

CURTIS INDUSTRIES
Division of Congoleum Corporation
CT Systems
123 South Broad Street
Philadelphia, Pennsylvania

DANA CORPORATION
4500 Orr Street
P.O. Box 1000
Toledo, Ohio 43697

~~Corporate Trust Inc.~~
Resident Agent
32 South Street
Baltimore, Maryland 21202

D.A.R. INDUSTRIAL PRODUCTS, INC.
3645 N. Smedley Street
Philadelphia, Pennsylvania 19140

DAVIS BRAKE & EQUIPMENT
CORPORATION
62 2219 N. Second Street
Philadelphia, Pennsylvania 19123

DECKER ASSOCIATES, INC.
Pennsylvania

DELAWARE INSULATION COMPANY
Fifth Avenue & Coleman Streets
Wilmington, Delaware 19899

DELAWARE VALLEY SAFEGUARD
COMPANY, INCORPORATED
Leiz's Road
R D #1
Leesport, Pennsylvania 19533

DELCO PRODUCTS
P.O. Box 1042
Dayton, Ohio
or
3031 West Grand Blvd.
P.O. Box 33122
Detroit, Michigan

DRAVCO CORPORATION
One Oliver Plaza
Pittsburgh, Pennsylvania 15222

DRESSER INDUSTRIES, INC.
c/o CT Corporation Systems
320 Oliver Building
Pittsburgh, Pennsylvania 15222

DURABLE
27 Industrial Boulevard
Paoli, Pennsylvania 19301
or

5th & Liberty Avenues
Pittsburgh, Pennsylvania

DURAMETALLIC CORPORATION
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

DUROX EQUIPMENT COMPANY
12351 Prospect Road
Cleveland, Ohio 44136

EAGLE-PICHER INDUSTRIES, INC.
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

EARL B. BEACH COMPANY
A Pennsylvania Corporation
546 Penn Street
Yeadon, Pennsylvania

EAST PENN REFRACTORIES
P. O. Box 277
Lehigh Street
Reading, Pennsylvania 19603

EATON CORPORATION, formerly known
as Cutler Hammer, Inc.
c/o C. T. Corporation
123 Broad Street
Philadelphia, Pennsylvania

EGNEP (PTY) LTD.
Burlington House
22 Rissik Street
Johannesburg, Tvl
Republic of South Africa

ELBO INDUSTRIAL SUPPLY COMPANY
305 N.6th Street
Philadelphia, Pennsylvania 19106

EMPIRE ACE INSULATION COMPANY
One Cozin Avenue
Brooklyn, New York 11207

EMPIRE INSULATION OF NORTHEAST MISSOURI
c/o Gilbert Coan
Box 215
Lewiston, Missouri 63452

ERIE-LACKAWANNA, INC.
1302 Midland Building
Cleveland, Ohio 44115

F. B. WRIGHT DISTRIBUTION CO.
180 Church Street
King of Prussia, Pennsylvania

FERRO ENGINEERING, a Division of
Oglebay Norton Company
100 West 10th Street
Wilmington, Delaware 19801

FISREBOARD CORPORATION
22 Battery Street
Suite 404
San Francisco, California 94133

FIRESTONE TIRE & RUBBER CO.
Worldbestos Division
1112 South 25th Street
New Castle, Indiana 47362

FLEXITALLIC GASKET COMPANY
151 Heller Place
Bellmawr, New Jersey 08031

FLINTKOTE CO.
365 W. Passaic Street
Rochelle Park, New Jersey 07662
or
4 Embarcadero Center
San Francisco, California 94111

FORD MOTOR COMPANY
c/o Sidney Kelly
The American Road
Dearborn, Michigan 48121

FOSECO, INCORPORATED
123 South Broad Street
Philadelphia, Pennsylvania 19109

FOSTER WHEELER CORPORATION
668 5th Avenue
New York, New York 10019

GAF CORPORATION
c/o Prentice Hall Corporation Systems
100 Pine Street
Harrisburg, Pennsylvania 17108
or
1361 Alps Road
Wayne, New Jersey 07470

GARFIELD MOLDING COMPANY, INC.
P.O. Box 40
Garfield, New Jersey 17026

GARLOCK, INC.
P.O. Box 8090
Longview, Texas 75601

GENERAL ELECTRIC COMPANY
One River Road
Schnectady, New York

GENERAL MOTORS CORPORATION
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

GENERAL REFACTORIES
225 City Avenue
Bala Cynwyd, Pennsylvania 19004

GENSTAR CORPORATION
Suite 38000
Four Embarcadero Center
San Francisco, California 96111

GEORGE A. ROWLEY & CO., INC.
a/k/a Peltz Rowley
5700 Tacony Street
Philadelphia, Pennsylvania 19135

GEORGE V. HAMILTON, INC.
326 Linden Street
McKees Rocks, Pennsylvania

GEORGIA-PACIFIC CORPORATION
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

GLOBE REFRACTORIES, INC.
P. O. Box D
Newell, West Virginia 26050

GOULDS PUMPS, INC.
240 Fall Street
Seneca Falls, New York 13148

GREEN TWEED & COMPANY, INC.
Deweller Road
Kulpsville, Pennsylvania

GRIFFIN WHEEL COMPANY
Division of Amsted
3700 Prudential Plaza
Chicago, Illinois 60601

GRUMMAN OHIO CORPORATION
c/o C.T. Corporation
123 S. Broad Street
Philadelphia, Pennsylvania 19109

GTE SYLVANIA
c/o C. T. Corporation
123 Broad Street
Philadelphia, Pennsylvania

HAJOCA PLUMBING COMPANY
123 South Broad Street
Philadelphia, Pennsylvania 19109

HARNISCHFEGGER CORPORATION
CT Systems
123 South Broad St.
Philadelphia, Pennsylvania 19107

H. K. PORTER CO., INC.
Porter Building
601 Grant Street
Pittsburgh, Pennsylvania 15219

HOPEMAN BROTHERS, INC.
435 Essex Avenue
Waynesboro, Virginia 22980

HUXLEY DEVELOPMENT CORP.
805 3rd Avenue, 28th Floor
New York, New York 10022

INDUSTRIAL PRODUCTS COMPANY
21 Cabot Boulevard
Langhorne, Pennsylvania 19047

INDUSTRIAL SALESMAN
S. Clinton & Elmer
Trenton, New Jersey 08611

INSULATION MATERIALS, INC.
400 Penn Centre Boulevard
Suite 204
Pittsburgh, Pennsylvania

INSULATION PRODUCTS CORPORATION
2100 East Ohio Street
Pittsburgh, Pennsylvania

INTERNATIONAL HARVESTER COMPANY
5401 N. Michigan Avenue
Chicago, Illinois 60611

JACQUAYS ASBESTOS COMPANY
c/o Jacquay's Mining Corporation
1219 South 19th Avenue
Phoenix, Arizona 85009

J.H. FRANCE REFRACTORIES CO.
Clarence Road
Snow Shoe, Pennsylvania 16874

JOHN CRANE-HOUDAILLE, INC.
682 Parkway Drive
Broomall, Pennsylvania 19008
or
c/o C. T. Corporation System
123 Broad Street
Philadelphia, Pennsylvania 19109

J. P. STEVENS, INC.
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

J. W. ROBERTS, LTD.
20 Saint Mary's Parsonage
Manchester M3 2NL, England

KANE BROTHERS
457 A Street
Sharon, Pennsylvania 16146

KAY WHEEL SALES
1771 Tomlinson Road
Philadelphia, Pennsylvania

KEENE CORPORATION
c/o Prentice Hall Corporations
Systems, Inc.
100 Pine Street
Harrisburg, Pennsylvania 17108

LAC D'AMIANTE DU QUEBEC LTEE.
P.O. Box 608, Black Lake
Quebec, GOW 1A0, Canada

LEAR SIEGLER, INC.
3171 South Bundy Drive
Santa Monica, California 90406

LEHIGH VALLEY RAILROAD COMPANY
415 Brighton Street
Bethlehem, Pennsylvania 19017

LEHIGH VALLEY REFRACTORIES, INC.
Roosevelt and MacArthur Roads
Whitehall, Pennsylvania

LENCO, INC.
319 W. Main Street
Jackson, Missouri 63755

LEONARD J. BUCK, INC.
c/o Francis J. Minchak
P. O. Box 505
2 Shumpike Road
Madison, New Jersey 07940

MACK TRUCKS, INC.
2100 Mack Boulevard
P.O. Box M
Allentown, Pennsylvania 18195

MANUFACTURED RUBBER PRODUCTS COMPANY
4502 N. Howard Street
Philadelphia, Pennsylvania 19140

MAREMONT CORPORATION
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109
or
200 E. Randolph Street
Chicago, Illinois

MCCORD GASKET
191 Labadie Avenue
Wyandotte, Michigan 48192

MELRATH GASKET COMPANY, INC.
wholly-owned subsidiary of
Melrath Gasket Holding Company, Inc.
39th Street and Hunting Park Avenue
Philadelphia, Pennsylvania
a/k/a a TNT LIQUIDATING CO.

MELRATH GASKET HOLDING COMPANY, INC.
30th Street and Hunting Park Avenue
Philadelphia, Pennsylvania
a/k/a a TNT LIQUIDATING CO.

MERIDEN MOLDED PLASTICS, INC.
112 Empire Avenue
Meriden, Connecticut 06450

METROPOLITAN LIFE INSURANCE COMPANY
c/o Kennety D. Merin, Director
N.J. Department of Insurance
201 East State Street
CN 325
Trenton, New Jersey 08625

MOHAWK MANUFACTURING
7354 N. Caldwell
Niles, Illinois

MONSEY PRODUCTS
Cold Stream Road
Kimberton, Pennsylvania

MOTOR SERVICES
573 Fourth Avenue
Brooklyn, New York

NATIONAL GYPSUM COMPANY
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

NATIONAL RAILROAD PASSENGER CORPORATION
1617 J.F.K. Boulevard, Room 710
Philadelphia, Pennsylvania 19104

NATIONAL U.S. BOILER CO., INC.
New Castle, Pennsylvania

NAVISTAR INTERNATIONAL CORPORATION
c/o CT Corporation System
Oliver Building
Mellon Square
Pittsburgh, Pennsylvania 15222

NEW YORKER STEEL BOILER COMPANY, INC.
Bathlehem Pike
Colmar, Pennsylvania 18915

NICOLET, INC.
a Delaware corporation
Maple Street and Wissahickon Avenue
Ambler, Pennsylvania 19002

NIMCO BUS SALES AND BUS PARTS
252 Doremus Avenue
Newark, New Jersey 07105

NORCA CORPORATION
185 Great Neck Road
Great Neck, New York

NORTH AMERICAN ASBESTOS COMPANY
c/o Lord, Bisselle & Block
115 S. LaSalle Street
Chicago, Illinois

NOSROC CORPORATION
1500 Walnut
Philadelphia, Pennsylvania 19102

NUTURN CORPORATION
570 Metroplex Drive
Nashville, Tennessee 37211
or
c/o C.T. Corporation System
530 Gay Street
Knoxville, Tennessee 37902

NYCAL
240 S. Main St.
S. Hackersock, New Jersey 07605

OWENS-CORNING FIBERGLAS CORP.
123 South Broad Street
Philadelphia, Pennsylvania 19109

OWENS-ILLINOIS GLASS CO.
460 N. Gulph Road
King of Prussia, Pennsylvania

OWENS-ILLINOIS, INC.
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

PARS MANUFACTURING COMPANY
60 East Penn Street
Norristown, Pennsylvania 19401

PARSON SALES COMPANY, INC.
Pennsylvania

PEERLESS INDUSTRIES, INC.
Spring and Schaeffer Streets
Boyertown, Pennsylvania 19512

PELTZ ROWLEY CHEMICAL COMPANY
5700 Tacony Street
Philadelphia, Pennsylvania

PENN CENTRAL CORPORATION
IVB Building
1700 Market Street
Philadelphia, Pennsylvania 19103

PENNSYLVANIA BRAKE BONDING
9001 Torresdale Avenue
Philadelphia, Pennsylvania 19124

PENN VALVE & FITTING CORPORATION
2440 Maryland Road
Willow Grove, Pennsylvania 19090

PFIZER, INC.
235 East 42nd Street
New York, New York 10017

PITTSBURGH CORNING CORPORATION
1670 Golden Mile Highway
Monroeville, Pennsylvania 15146

PORTER HAYDEN CO.
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

PPG INDUSTRIES
One Gateway Center
Pittsburgh, Pennsylvania 15222

QUIGLEY CO., INC.
c/o C.T. Corporation
123 Broad Street
Philadelphia, Pennsylvania
or
c/o C.T. Corporation Systems
277 Park Avenue
New York, New York 10017

QUINT CORPORATION
140 East 16th Street
Erie, Pennsylvania 16512

RAND MINES LTD.
The Corner House
63 Fox Street
Johannesburg 2001 TVL
Republic of South Africa

RAYMARK INDUSTRIES INC.
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

THE READING COMPANY
1 North 12th Street
Philadelphia, Pennsylvania 19107

RICHARD KLINGER COMPANY
2350 Campbell Road
Sidney, Ohio 45365

RILEY STOKER CORPORATION
No. 9 Neponset Street
Worcester, Massachusetts 01606

R-M FRICTION MATERIALS COMPANY
100 Oak View Drive
Trumbull, Connecticut 06611

ROCK BESTOS CO.
400 Penn Centre Boulevard
Suite 204
Pittsburgh, Pennsylvania

ROCKWELL INTERNATIONAL
c/o CT Corporation Systems
Oliver Building
Mellon Square
Pittsburgh, Pennsylvania 15222

ROCK WOOL MFG. CO.
P. O. Box 506
Leeds, Alabama 35094

ROGERS CORPORATION
One Technology Drive
Rogers, Connecticut 06263

ROYAL ELECTRIC SUPPLY COMPANY
3730 Market Street
Philadelphia, Pennsylvania

SAGER CORPORATION, formerly known as
Sager Gloves
An Illinois Corporation
4030 North Nashville Street
Chicago, Illinois 60634

SEPCO CORPORATION
P. O. Box 854
or
Clokan J. Hollan
27611 LaPaza Road
Laguna Niguel, California 92677

SID HARVEY MID ATLANTIC, INC.
King of Prussia, Pennsylvania

SMITH OF PHILADELPHIA
811 E. Cayuga Street
Philadelphia, Pennsylvania 19124

SMS AUTOMOTIVE PRODUCTS
4819 Langdon Street
Philadelphia, Pennsylvania

SOUTHEASTERN PENNSYLVANIA TRANSPORTATION
AUTHORITY
130 S. 9th Street
5th Floor
Philadelphia, Pennsylvania 19107

SOUTHERN TEXTILE CORP.
c/o Porter Building
601 Grant Street
Pittsburgh, Pennsylvania 15219

SPECIAL MATERIALS, INC. - WISCONSIN
C.T. Corporation
222 Washington
Madison, Wisconsin
or
3623 W. Pierce
Milwaukee, Wisconsin 53215

SPRAYON RESEARCH CORPORATION
c/o Richard Kempthorne
1390 South Ocean Blvd.
Pompano Beach, Florida 33062

STRAHMAN VALVES, INC.
Nicolet Avenue
Florham Park, New Jersey

STEARNS DIV. OF F.M.C. CORP.
c/o C. T. Corporation
123 Broad Street
Philadelphia, Pennsylvania

STUDEBAKER-WORTHINGTON, INC.
c/o Corporation Trust Center
1209 Orange Street
Wilmington, Delaware 19801

THERMAL MATERIALS CORP.
360 Hurst Street
Linden, New Jersey

TNT LIQUIDATING COMPANY
600 First National Bank Bldg.
Erie, Pennsylvania

TRANSCO, INC.
55 East Jackson Boulevard
Chicago, Illinois 60604

TRANSVAAL CONSOLIDATION LAND
& EXPLORATION CO.; LTD.
Johannesberg, South Africa

TURNER ASBESTOS FIBRES, LTD.
c/o Turner & Newall, Ltd.
20 St. Mary's Parsonage
Manchester, M3 2NL, England

TURNER & NEWALL, LTD.
20 Saint Mary's Parsonage
Manchester, England M22-EA

UNION CARBIDE CORPORATION
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

UNIROYAL, INC.
c/o Prentice Hall Corporation
100 Pine Street
Harrisburg, Pennsylvania 17101

UNITED STATES GYPSUM COMPANY
c/o C.T. Corporation System
123 South Broad Street
Philadelphia, Pennsylvania 19109

UNITED STATES MINERAL PRODUCTS COMPANY
Farnace Street
Stanhope, New Jersey 97874

UNIVERSAL INSULATION COMPANY
c/o Arthur Rank
306 Hialeah Drive
Cherry Hill, New Jersey 08002

U.S. BRAKELINING CORP.
Miami, Florida

VERMONT ASBESTOS GROUP, INC.
Box 54B, R.R. #1
Morrisville, Vermont 05661
OR
c/o David Stockpole
P. O. Box 1016
Stowe, Vermont 05672

WAGNER ELECTRIC COMPANY
100 Misty Lane
Parsippany, New Jersey 07054